

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

RUDOLPH J. GEIST, *et al.*,

\*

Plaintiffs,

\*

Case No. 8:16-cv-03630-PX

v.

\*

Judge Paula Xinis

HISPANIC INFORMATION AND  
TELECOMMUNICATIONS NETWORK,  
INC.,

\*

\*

Defendant.

\*

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**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant the Hispanic Information and Telecommunications Network, Inc., by and through the undersigned counsel and with the agreement and consent of Plaintiffs, hereby moves the Court for an extension of fourteen (14) days in which to serve a motion or responsive pleading. According to the Court's docket, Defendant's motion or responsive pleading currently is due on December 1, 2016. Defendant requests a 14-day extension until December 15, 2016.

In support of its request, Defendant states that it did not become aware that Plaintiff had served or attempted to serve the Complaint and summons through the New York Secretary of State until November 22, 2016 and that additional time is needed for Defendant to engage counsel and to prepare its response to the Complaint, especially in light of the Thanksgiving holidays this past week. Defendant makes this request without waiver of or prejudice to any and all defenses to the Complaint, including any and all of the defenses set forth in Rule 12(b) of the Federal Rules of Civil Procedure and any other argument or defense.

Pursuant to Local Rule 105.9, Defendant has requested the consent of counsel for Plaintiffs and provided such counsel reasonable notice of the instant motion. Plaintiffs do not oppose the requested extension until December 15.

WHEREFORE, Defendant respectfully requests that the Court extend the deadline for Defendant to answer or otherwise respond to the Complaint until December 15, 2016.

Dated: November 29, 2016

Respectfully Submitted,

/s/Tillman J. Finley  
Tillman J. Finley (D. Md. Bar No. 16719)  
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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29<sup>th</sup> day of November, 2016, copies of the foregoing were sent, via the Court's electronic filing system, to the following counsel of record:

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*Counsel for Plaintiffs*

/s/Tillman J. Finley